United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	3 DE0010073 11	12 12/07/23 17	18 S	19 S	20 2

Remarks: 21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time/Date	Permit Effective Date
PINNACLE FOODS GROUP, LLC 29984 Pinnacle Way Millsboro, DE 19966	1020 hrs. 07/23/12	11/1/08
	Exit Time/Date	Permit Expiration Date
	1250 hrs 07/23/12	10/31/13

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data (e.g., SIC NAICS, and other descriptive information)
ROBERT LYNCH - DRC Level IV 302-934-3833	

Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted
Randy Spence - Plant Mgr 302-934-3841	☒ Yes ☐ No

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

☑ Permit	☑ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☑ Records/Reports	☐ Compliance Schedules	☑ Pollution Prevention	
☑ Facility Site Review	☑ Laboratory	☑ Storm Water	
☑ Effluent/Receiving Waters	☑ Operations & Maintenance	☐ Combined Sewer Overflow	
☑ Flow Measurement	☑ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Nicole Smith Nicole Smith	DNREC 302-739-9946	7/23/12
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	DNREC 302-739-9946	8-25-12

Form Approved
OMB No. 158 - R0073

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable

PERMIT NO. DE0000736

SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY *(Including City, County and ZIP code)*

DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE: 8/4/11

FINDINGS: See Report

SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*

DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:			
(i) SAMPLING DATE, TIME, EXACT LOCATION	☑ YES	☐ NO	☐ N/A
(ii) ANALYSES DATES, TIMES	☑ YES	☐ NO	☐ N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	☑ YES	☐ NO	☐ N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	☑ YES	☐ NO	☐ N/A
(v) ANALYTICAL RESULTS *(e.g., consistent with self-monitoring report data)*	☑ YES	☐ NO	☐ N/A
(b) MONITORING RECORDS *(e.g.,flow, pH, D.O., etc.)* MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS *(e.g. continuous monitoring instrumentation, calibration and maintenance records).*	☑ YES	☐ NO	☐ N/A
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.	☑ YES	☐ NO	☐ N/A
(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.	☑ YES	☐ NO	☐ N/A
(e) QUALITY ASSURANCE RECORDS KEPT.	☑ YES	☐ NO	☐ N/A
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES *(and their compliance status)* USING PUBLICLY OWNED TREATMENT WORKS.	☐ YES	☐ NO	☑ N/A

SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*

DETAILS:

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.	☑ YES	☐ NO	☐ N/A
(b) FACILITY IS AS DESCRIBED IN PERMIT.	☑ YES	☐ NO	☐ N/A
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.	☑ YES	☐ NO	☐ N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.	☑ YES	☐ NO	☐ N/A
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.	☐ YES	☐ NO	☑ N/A
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED. SEPARATE FLOW METER	☑ YES	☐ NO	☐ N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.	☑ YES	☐ NO	☐ N/A
(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.	☑ YES	☐ NO	☐ N/A
(i) ALL DISCHARGES ARE PERMITTED.	☑ YES	☐ NO	☐ N/A

SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*

DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. NO POWER/NO FLOW	☐ YES	☐ NO	☑ N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☑ YES	☐ NO	☐ N/A
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.	☐ YES	☐ NO	☑ N/A
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.	☑ YES	☐ NO	☐ N/A
(e) ALL TREATMENT UNITS IN SERVICE.	☑ YES	☐ NO	☐ N/A
(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS.	☐ YES	☑ NO	☐ N/A
(g) QUALIFIED OPERATING STAFF PROVIDED.	☑ YES	☐ NO	☐ N/A
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. OIT, STCC, DRWA	☑ YES	☐ NO	☐ N/A
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.	☑ YES	☐ NO	☐ N/A
(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.	☑ YES	☐ NO	☐ N/A
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED. LAST REVIEW 2/12	☑ YES	☐ NO	☐ N/A
(l) SPCC PLAN AVAILABLE. 6/15/12	☑ YES	☐ NO	☐ N/A
(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. *(Dates _____ _____)*	☐ YES	☐ NO	☑ N/A
(n) ANY BY-PASSING SINCE LAST INSPECTION.	☐ YES	☑ NO	☐ N/A
(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.	☐ YES	☑ NO	☐ N/A

PERMIT NO. DE0000736

SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE. ☐ YES ☐ NO ☑ N/A *(Further explanation attached _____)*

CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING *(mortgage commitments, grants, etc.)*.
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☐ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

SECTION K - Self-Monitoring Program

Part 1 – Flow measurement *(Further explanation attached _____)*			
PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.	☑ YES	☐ NO	☐ N/A
DETAILS			
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED. w/ultrasonic	☑ YES	☐ NO	☐ N/A
TYPE OF DEVICE: ☑ WEIR ☐ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☐ OTHER *(Specify _____)*			
(b) CALIBRATION FREQUENCY ADEQUATE. *(Date of last calibration* 2/12 *)*	☑ YES	☐ NO	☐ N/A
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.	☑ YES	☐ NO	☐ N/A
(d) SECONDARY INSTRUMENTS *(totalizers, recorders, etc.)* PROPERLY OPERATED AND MAINTAINED.	☑ YES	☐ NO	☐ N/A
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.	☑ YES	☐ NO	☐ N/A
Part 2 – Sampling *(Further explanation attached _____)*			
PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.	☑ YES	☐ NO	☐ N/A
DETAILS:			
(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☑ YES	☐ NO	☐ N/A
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.	☑ YES	☐ NO	☐ N/A
(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. IF NO, ☐ GRAB ☐ MANUAL COMPOSITE ☐ AUTOMATIC COMPOSITE FREQUENCY _____	☑ YES	☐ NO	☐ N/A
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.	☑ YES	☐ NO	☐ N/A
(i) SAMPLES REFRIGERATED DURING COMPOSITING	☑ YES	☐ NO	☐ N/A
(ii) PROPER PRESERVATION TECHNIQUES USED	☑ YES	☐ NO	☐ N/A
(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT	☑ YES	☐ NO	☐ N/A
(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3	☐ YES	☐ NO	☐ N/A
(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.	☐ YES	☑ NO	☐ N/A
(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.	☐ YES	☐ NO	☑ N/A
Part 3 – Laboratory *(Further explanation attached _____)*			
PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT.	☑ YES	☐ NO	☐ N/A
DETAILS:			
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. *(40 CFR 136.3)*	☑ YES	☐ NO	☐ N/A
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.	☐ YES	☐ NO	☑ N/A
(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. PROCESS CONTROL	☑ YES	☐ NO	☐ N/A
(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.	☑ YES	☐ NO	☐ N/A
(e) QUALITY CONTROL PROCEDURES USED.	☑ YES	☐ NO	☐ N/A
(f) DUPLICATE SAMPLES ARE ANALYZED. 25 % OF TIME.	☑ YES	☐ NO	☐ N/A
(g) SPIKED SAMPLES ARE USED. 100 % OF TIME.	☑ YES	☐ NO	☐ N/A
(h) COMMERCIAL LABORATORY USED.	☑ YES	☐ NO	☐ N/A
(i) COMMERCIAL LABORATORY STATE CERTIFIED.	☐ YES	☐ NO	☑ N/A

LAB NAME Envirocorp Labs

LAB ADDRESS Harrington, DE

Form Approved
OMB No. 158.-R0073

PERMIT NO. DE0000736

SECTION L - Effluent/Receiving Water Observations *(Further explanation attached _____)*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	NO	NO	NO	NO	NO	Light green	—
002	CLEAN & DRY						
003	CLEAN & DRY						
004	NO	NO	NO	NO	NO	CLEAR	*NO FLOW
005-009	CLEAN & DRY						

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M - Sampling Inspection Procedures and Observations *(Further explanation attached _____)*

- ☑ GRAB SAMPLES OBTAINED
- ☑ COMPOSITE OBTAINED
- ☐ FLOW PROPORTIONED SAMPLE
- ☐ AUTOMATIC SAMPLER USED
- ☑ SAMPLE SPLIT WITH PERMITTEE
- ☑ CHAIN OF CUSTODY EMPLOYED
- ☑ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

*Sampled on 7/25/12

COMPOSITING FREQUENCY _____ PRESERVATION REF.

SAMPLE REFRIGERATED DURING COMPOSITING: ☑ YES ☐ NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE yes

SECTION N - Analytical Results *(Attach report if necessary)*

*see analytical report

WATER COMPLIANCE INSPECTION REPORT
STORM WATER EVALUATION
National Pollutant Discharge Elimination System Permitting Program
Delaware Department of Natural Resources and Environmental Control
Surface Water Discharges Section

Name and location of Facility Inspected PINNACLE FOODS GROUP, LLC MILLSBORO, DE	**Entry Date/Time** 7/23/12 1020 hrs
Facility Permit No. DE0000736	
Facility Contact Bob Lynch	**Exit Date/Time** 7/23/12 1250hrs

An evaluation of the facility's storm water management program was completed in order to determine whether or not the facility is operating in compliance with regards to the storm water permitting requirements of their NPDES permit. The evaluation consisted of a records review and a visual observation of the facility's storm water management system.

The facility is permitted to discharge storm water from Outfall(s)

RECORDS REVIEW	Yes	No	S/C
1) **Storm Water Plan.** Has the facility developed and implemented a Storm Water Plan as required by Part III of their NPDES Permit? What is the date of the current SWP? 11/11	✓		
2) **Training.** Training completed annually? Are all employees and contractor personnel that work in areas where industrial materials are used/stored trained to meet the requirements of the SWP?			
3) **Inspection Records.** Are storm water inspections conducted and documented? Please describe.	✓		
4) **Monitoring Data.** Has the facility performed storm water monitoring as required by the permit?	✓		
5) **Spill and Leaks.** Have any major spills or leaks occurred resulting in a discharge to the storm water conveyance system?		✓	
If so, are records maintained indicating spills/leaks?		N/A	

PHYSICAL INSPECTION	Yes	No	S/C
1) **Storm Water Outfalls.** Are storm water outfalls identified as required?	✓		
Outfalls free of trash/ debris/erosion?	✓		
Any non-storm water discharges occurring?		✓	
2) **Storm Water Conveyance System.** Are catch basins, storm water conveyance systems and storm water treatment facilities cleaned at appropriate intervals? Is the storm water conveyance system free of trash and debris?	✓		
3) **Good Housekeeping Practices.** Are outside areas kept neat and clean? Is process debris removed regularly?	✓		
Is there evidence of leaks/spills?		✓	
Is there evidence of particulate matter or visible deposits and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water discharge?		✓	
4) **Storm Water Pollution:** materials being stored in a manner that minimizes their exposure to storm water?	✓		

5) **Storm Water Visual Observations:** Are the following present in storm water discharges or do the outfalls indicate evidence thereof?

OUTFALL NUMBER	OIL SHEEN	VISIBLE FOAM	VISIBLE FLOATING SOLIDS	COLOR
002, 003, 005-009	DRY & CLEAN			
004 NO FLOW	NO	NO	NO	CLEAR

COMMENTS

Compliance Status At Time of Inspection: Compliant

Reconnaissance Inspection Required: Yes or (No) **If Yes, an Inspection shall be completed within ___ months.**

Inspector's Printed Name: Nicole Smith

Inspector's Signature: Nicole Smith **Date:** 7/23/12

DNREC Form Storm Water-07 (Revision 2-07) Previous editions are obsolete.

HORNEY INDUSTRIAL ELECTRONICS

Process Control Technology

CERTIFICATE OF CALIBRATION

Date : February 23, 2012

Pinnacle Foods
29984 Pinnacle Way
Millsboro DE 19966

Purchase Order: 0710030102 Job#:606240

Manfg.	Serial#	Range
EB Flow:		
E/H FMU 861	8AR009-EP40	0-400 GPM
Raw Flow:		
F/P 1392 C/R	9508-51045-C03	0-1200 GPM
UV Effluent Flow:		
F/P 1392 C/R	941140025-803	0-500 GPM
Spray Irrigation:		
H/W DR4500AT C/R	0911Y980723300002	0-400 GPM
Siemens Mag 5000	104213N056	0-400 GPM
Siemens Mag 5100 3" Tube	469113T036	0-400 GPM
WTB:		
Siemens Mag 5000	840849N164	0-2000 GPM
Siemens Mag 5100 8"	289009T254	0-2000 GPM
H/W DR45 C/R	9932Y92662600001	0-2000 GPM

HORNEY INDUSTRIAL ELECTRONICS

Process Control Technology

Tank Alarm:		
Kep INT69 #4	47925	32-480" H2O
IFM	4430B	0-480" H2O
Kep Int69 #5	51824	55-455" H2O
IFM	4611B	0-480" H2O

ALL CALIBRATION TRACEABLE TO N.I.S.T. AS PER MANFG. SPECIFICATION

P. O. BOX 700 • BRIDGEVILLE, DELAWARE 19933 • 302-337-3600 • FAX 302-337-8560

Rob Tynch
934-3633

HIE
HORNEY INDUSTRIAL ELECTRONICS
Process Control Technology

CALIBRATION WORKSHEET

No. 001030

P.O. Box 700 Bridgeville, DE 19933
Phone (302) 337-3600 Fax (302) 337-8560

Customer Name: Pinnacle Woods	Customer PO No.: 0710030102
Address: 29984 Pinnacle Way	Account No.:
City, State, Zip: Millsboro, DE. 19966	Date: 2/23/12
Job Description: Calibration	Terms: Net 20

Manufacturer	Serial Number	Range	Departure
E+H FMU861	8AD009FD410	0-400	
V0H1 3.382 ACTUAL 2			
V2H2 52 PALMER BOWLUS			
		"	
F/P 1392 + J550	9508 51045 C02	0-1200	
288GPM 5 3/4" SIMULATED TABLE 13.4 289.9GPM Z 40.76		ACTUAL Z	
F/P 1392 + J550	9411 40025803	0-500	
H/W MEASURE 4.75" 112GPM TABLE 9.5 113.5GPM Z 29.85		ACTUAL Z	SIM 113.5GPM
SIEMENS MAG5000	102213 H056	0-400	
SIEMENS MAG5100 2"	469113T036	0-400	
H/W MAG500 DR45	0911498072330000 2	0-400	
SIEMENS MAG5000	840849N164	0-2000	
SIEMENS MAG5100 8"	287009T254	0-2000	
H/W DR45	9932492662600001	0-2000 CH1	ONLY
KEP INT69	47925	32-480'	
IFM	46130B	0-480	

Comments		Hours
KEP INT69	51824	55.455
IME	461113	0-480
* INVESTIGATE TROJEN UV ISSUES + QUOTE 2 DO SYSTEMS		

Service Engineer: [signature]

Customer Signature: B. Tynch Date: 2/23/12

Above work was completed to our satisfaction

Non-Hazardous Liquid Waste Transporters Permit

Issued by: Groundwater Discharges Section
Division of Water Resources
Department of Natural Resources
and Environmental Control
89 Kings Highway
Dover Delaware 19901
302-739-9948

Synagro - WWT, Inc.
7014 E Baltimore Street
Baltimore MD 21224

Permit Number: **DE OH-254**
Issue Date: 01/11/2010
Expiration Date: 01/10/2015

Pursuant to the provisions of 7 Del. C., Chapter 60, and the State of Delaware Department of Natural Resources and Environmental Control's Guidance and Regulations Governing the Land Treatment of Wastes, permission is hereby granted to Synagro - WWT, Inc. to operate and maintain the vehicle(s) listed in the permit application and any supplemental submissions to the Department, operated by Synagro - WWT, Inc., for the purpose of collecting, transporting through Delaware and disposing of the non-hazardous liquid wastes listed in Condition 1 of this permit.

A copy of this permit must accompany each permitted vehicle and be presented upon request to any law enforcement officer or representative of the Department of Natural Resources and Environmental Control.

This permit is issued subject to the following conditions:

1. Disposal site(s) for all waste(s) transported shall be the following:

   a. biosolids originating outside the State of Delaware, across the State of Delaware to a site located in another state & non-hazardous liquid wastes and biosolids from several wastewater treatment plants and food processing facilities in the State of Delaware

      i) State of Delaware Agricultural Utilization Permit AGU0024/94B & AGU 0025/9513 and State of DE Land Application Approval M-07-06.

2. Permittee shall maintain a current copy of their permit/authorization documentation for each facility listed in Condition 1 on file with the Department.

3. All receiving stations must be in compliance with all Federal, State and local regulations.

4. None of the wastes shall be deposited into ditches, watercourses, lakes, ponds, tidewater sources, landed property or at any point other than the disposal site(s) mentioned in Condition 1 above.

5. All waste material collected by permittee shall be transported and disposed of in accordance with the regulations of the Department of Natural Resources and Environmental Control and upon authorization by the disposal site(s) listed in Condition 1 above. None of these wastes may be disposed of within the State of Delaware without specific permission of the Department.

6. The company name, address and permit number shall be displayed on both sides of each vehicle used for hauling purposes in letters not less than three inches high and of a color contrasting the color of the vehicle.

7. Every vehicle used for waste transporting purposes shall be equipped with a leak-proof tank or body and shall be maintained in a clean and sanitary condition. All pumps, hoses, and vehicle tanks or bodies shall be maintained so as to prevent leakage. Provisions shall be made to discharge all liquid waste through a leak-proof hose from the tank compartment of the vehicle.

SYNAGRO CENTRAL, LLC
7014 EAST BALTIMORE STREET
BALTIMORE, MD 21224

PROJECT: 1103 - PINNACLE FOODS / MILLSBORO, DE
4/1/2012 thru 4/30/2012

PLANT: 01 - VLASIC FACILITY

Field: DE-SX-00003-0-0007-G

Date Applied	Total	Unit	Type
4/2/2012	77,000.00	G	LIQ
4/3/2012	210,000.00	G	LIQ
4/4/2012	133,000.00	G	LIQ
LIQ Gallons:	**420,000.00**		
Field Total (Gallons):	**420,000.00**		

Field: DE-SX-00003-0-007J-1

Date Applied	Total	Unit	Type
4/2/2012	49,000.00	G	LIQ
LIQ Gallons:	**49,000.00**		
Field Total (Gallons):	**49,000.00**		
Plant Total Gallons:	**469,000.00**		

Printed: 4/25/2012
13:11

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL
DIVISION OF WATER
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

ENVIRONMENTAL
LABORATORY SECTION

PHONE: (302) 739-9942
FAX: (302) 739-3491

August 01, 2012

J. Chris Cleaver
DWR - Surface Water Discharge Section - NPDES
89 Kings Highway
Dover, DE 19901

Attention: J. Chris Cleaver

Attached you will find the following Laboratory Results:

Order Number:	1207047
Project Description:	Pinnacle
Date Received:	07/25/2012
Time Received:	13:50

If you have any questions regarding this data, please contact me at the above telephone number.

Sincerely,

Kathy A. Knowles
Laboratory Manager

Delaware's good nature depends on you!

Environmental Laboratory Section - Division of Water
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

ANALYSIS REPORT

ELS Sample Number:	1207047-001	***Matrix:***	Waste Water
Client Sample Description:	001	***Sampling Method:***	Grab
Site ID:	001	***Date and Time Collected:***	7/25/2012

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Inorganic Nonmetallic Constituents						
Ammonia as N, Total	USEPA 350.1	0.058	mg/L		0.020	07/26/2012
Phosphorus, Total, Alkaline Persulfate	APHA 4500-P-J	0.134	mg/L		0.010	07/31/2012
Organic Aggregate Constituents						
BOD, 5-Day	APHA 5210-B	< 2.40	mg/L		2.40	07/26/2012
Physical and Aggregate Properties						
Residue, Nonfilterable (TSS)	APHA 2540-D	6	mg/L		2	07/31/2012

ANALYSIS REPORT

ELS Sample Number:	1207047-002	***Matrix:***	Waste Water
Client Sample Description:	001	***Sampling Method:***	Grab
Site ID:	001	***Date and Time Collected:***	7/25/2012 10:30

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Microbiological Examination						
Enterococcus	USEPA 1600	4	cfu/100ml		2	07/26/2012

ANALYSIS REPORT

ELS Sample Number:	1207047-003	***Matrix:***	Waste Water
Client Sample Description:	001-1	***Sampling Method:***	Grab
Site ID:	001-1	***Date and Time Collected:***	7/25/2012 10:31

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Microbiological Examination						
Enterococcus	USEPA 1600	1	cfu/100ml		1	07/26/2012

Environmental Laboratory Section - Division of Water
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

Qualifier Codes, Definitions, and Abbreviations

Qualifier/Flag

<	Sample value is below the method detection limit. The result is reported as < MDL.
>	Sample value is above the upper quantitation limit. The upper quantitation limit is reported.
AB	Air Bubble in DO bottle
B	The parameter was detected in the method blank at a concentration that was both above the LOQ and greater than 10% of the sample concentration.
BT	Secchi disk ON BOTTOM. The reported result is the depth from the surface to the bottom.
C	See report narrative or comment line for observations concerning this result.
D	Sample diluted for analysis.
FB	The parameter was detected in the field blank at a concentration that was both above the LOQ and greater than 10% of the sample concentration.
FZ	Samples frozen prior to analysis
I	The reported value is estimated due to the presence of interference.
IM	Instrument malfunctioned; No measurement reported.
J	Analyte present; reported value is estimated; concentration is below the range for accurate quantitation (greater than the MDL, but less than the LOQ).
JH	Result is likely overestimated due to matrix effect.
JL	Result is likely underestimated due to matrix effect.
LOQ	Limit of Quantitation
MDL	Method Detection Limit
N	This flag indicates presumptive evidence of a compound. This flag is only used for TICs, where the identification is based on a mass spectral library search and must be used in combination with the J flag. It is applied to all TIC results. For generic characterization of a TIC, such as chlorinated hydrocarbon, or for an "unknown" (no matches >= 85%), the "N" flag is not used.
NA	Not Analyzed but required by project workplan or analytical request form.
NBF	No bottom measurement recorded in the field due to shallow water; Bottom records are those measurements recorded at surface.
NC	Sample not collected, but required by the project work plan.
ND	Not Detected.
NE	Field measurement not taken due to uncontrollable field sampling event or Natural Condition (Depth of water too deep/shallow).
NF	Sample collected, but not analyzed by the laboratory due to field error.
NO	None Observed
NR	No Result. See report narrative or comments for explanation.
NV#	Analytical result not valid.
O	Sample outsourced for analysis. Data will be reported separately.
P	Sample not properly preserved in field in accordance with preservation requirements. Data may be suspect.
QC	Quality control value is outside acceptance limits.
QNS	Quantity not sufficient. Not enough sample to perform requested analyses.
S	Results will be reported in a separate report; See attached report.
SD	Sample discarded; Sample collected but not analyzed as per client request.
SNF	Site has no flow (i.e. a dry stream or a stream with no velocity)
STD	Stream too deep
STS	Site is too shallow to sample
TIC	Tentatively identified compound from a GC/MS library search.
U	Compound was analyzed but not detected. The method detection limit is reported.
UR	Unusual result. See narrative for an explanation.
USGS	USGS Gauge
V	Analysis performed after holding time expired.

Environmental Laboratory Section - Division of Water
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

Qualifier Codes, Definitions, and Abbreviations

Units

CFS	Cubic Feet per Second.
cfu/100mL	Colony forming units per 100 mL.
G	gram; there are 1000 g in 1 Kg.
GPM	Gallons per minute.
IN	Inches.
Kg	Kilogram.
L	Liter.
mg	milligram; there are 1000 mg in 1 g.
MGD	Millions of Gallons per Day.
ml	milliliter; there are 1000 ml in 1 L.
mpn/100mL	most probable number per 100 mL.
NTU	Nephelometric Turbidity Units. NTU is numerically equivalent to Formazin turbidity unit (FTU).
oC	Celsius.
pCi/L	Pico curie per liter.
ppb	Parts per billion=ug/Kg, ug/L.
ppm	Parts per million=mg/Kg, ug/g, mg/L, ug/ml; 1 ppm=1000 ppb.
su	Standard Units.
ug	microgram; there are 1000 ug in 1 mg.
uL	microliter; there are 1000 ul in 1 ml.
uMhos	Conductivity units for laboratory measurements.
uS	micro siemens; units used to measure conductivity in the field; same as uMhos.

Environmental Laboratory Section - Division of Water
Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 (302) 739-9942

FIELD CHAIN OF CUSTODY

(Complete in BLUE ink)

Page 1 of 1

Client	: J. Chris Cleaver	Report To	: J. Chris Cleaver
Address	: 89 Kings Highway	Invoice To	: J. Chris Cleaver
	Dover, DE 19901	Account	: NPDES
Phone No.:	(302)739-9946	ELS Order ID	: 1207047

PROJECT NAME Pinnacle

SAMPLERS (Please Print) J. Chris Cleaver

(ELS Use Only) Lab Log No.	Client Sample Description	Sample Date	Sample Time	Matrix*	Comp	Grab	No. Of Con-tainers	ANALYSES: TSS, BOD	Tphos, NH3	Entero						REMARKS
1207047-001	001	7.25	24HR	WW	✓		1	✓	✓							
1207047-002	001	↓	1030	↓		✓	1			✓						
1207047-003	001.1	↓	1031	↓		✓	1			✓						

RELINQUISHED BY: *(signature)*	DATE	TIME	RECEIVED BY: *(signature)*
C. Cleaver	7.25.12	1350	Renee L Heenan

DW - drinking water
ER - equip. rinseate
GW - ground water
Lab - lab water
LW - liquid waste
SE - sediment
SL - sludge
SO - soil
SW - surface water
TI - tissue
WS - solid waste
WW - waste water

COMMENTS:

BOD No Cl2

pH 7.3

Is laboratory chain-of-custody required? Yes / No

ELS USE ONLY

Sample Conditions (circle response):
1. Samples match COC? Yes/No 2. Bottles supplied by ELS? Yes/No 3. Samples received broken/leaking? Yes/No 4. Cooler temp bottle 2-6 degrees? Yes/No/NA
5. Properly preserved? Yes/No 6. VOA/DO containers free of headspace? Yes/No/NA 7. Holding times expired? Yes/No 8. Volume sufficient for analysis? Yes/No

Coc:040101

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES &
ENVIRONMENTAL CONTROL
DIVISION OF WATER
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

Surface Water Discharges Section

Telephone: (302) 739-9946
Facsimile: (302) 739-8369

July 25, 2012

Pinnacle Foods Group, LLC
Mr. Randy Spence – Plant Manager
29984 Pinnacle Way
Millsboro, DE 19966

Re: Compliance Sampling & Inspection (CSI) – July 23, 2012
NPDES Permit No. DE-0000736

Dear Mr. Spence,

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance & Enforcement Branch, I would first like to you, Mr. Bob Lynch, and your associates for the cooperation and assistance during the Compliance Sampling & Inspection (CSI) completed at the your facility on July 23, 2012.

Overall, the WWTP housekeeping and the plant operations were very good. Data handling and traceability were found to be very acceptable, and all data and reports requested were produced in a timely manner. All calibration documentation was produced and found to be up to date. Laboratory records, reagents, instrumentation, and methods were found to be within NPDES requirements. Mr. Lynch gave a fantastic tour of the facility and is to be complimented on his knowledge of the facility and dedication in keeping the plant operating efficiently and in compliance with NPDES Permit requirements.

The February 2012 DMR was reviewed and all entries were as reported by analytical (both in-house and contract labs), all calculations were correct, and all entries were accurate.

A comprehensive Storm Water Evaluation was also completed during this inspection. All storm water outfalls, except for 004, were clean and dry. Outfall 004 had approximately 3 inches of water in the catchbasin (no dry weather flow). A review of the SWPPP and SPCC Plan showed that all inspections and training are up to date.

During this CSI, there were no observable deficiencies and everyone at Pinnacle Foods Group is to be commended for their efforts. It is quite evident that the personnel take their jobs seriously and are committed to operating this facility in a very professional manner.

I would like to again thank you for your cooperation and participation in this Compliance Sampling & Inspection program to help assure the quality of NPDES effluent waters and the self-reporting data. If you have any questions, please contact Glenn Davis or me at 302-739-9946.

Sincerely,

Nicole L. Smith

Nicole L. Smith
Senior Environmental Compliance Specialist
Compliance & Enforcement Branch
Surface Water Discharges Section
State of Delaware – DNREC

Ecopy: Mr. Robert Underwood – DNREC
Mr. Glenn Davis - DNREC

Pinnacle Foods Group, LLC
Wastewater Treatment Plant
Annual Compliance Sampling and Inspection
July 23, 2012

On Monday July 23, 2012, Nicole Smith of the State of Delaware, Department of Natural Resources and Environmental Control, Division of Water, Surface Water Discharges Section, Compliance & Enforcement Branch, completed a Compliance Sampling and Inspection of the Pinnacle Foods Group Wastewater Treatment Plant (WWTP) in Millsboro, Delaware. Nicole Smith is the Senior Environmental Compliance Specialist for the Compliance & Enforcement Branch

The inspector arrived at the Millsboro, Delaware facility at approximately 1020 hrs. where she met with Mr. Robert Lynch (DRC- Level IV) and Mr. Randy Spence (Plant Mgr). After a short pre-inspection meeting, the inspector made a thorough inspection of the entire WWTP, including a review of the facility's storm water management practices.

General

The Millsboro, Delaware Plant is a pickling plant that utilizes screening, grit removal, a flow equalization (EQ) tank, a step feed system to the aeration basins, a secondary clarifier, sand filters and UV disinfection. Sludge from the process is sent to aerobic digesters, then to a sludge holding lagoon from which it is removed twice per year by Synagro.

Raw wastewater influent from the processing plant goes to two (2) main pump stations on site that pump the wastewater to the headworks, which consists of two (2) static screens, and then flows to a grit chamber for grit removal. Screenings and grit are collected in a dumpster and taken off site to the landfill. Effluent then flows to a lift station for the flow EQ tank (425,000 gal/cap) where it is aerated. From the flow EQ tank, the wastewater flows to a step feed tank which feeds the aeration basin (~1.1MG capacity). After aeration, three (3) clarifier pumps send the flow to the secondary clarifier (~130,000 gal/cap). Prior to the secondary clarifier, the wastewater is treated with polymer to aid in settling. Effluent from the clarifier flows to two (2) Parkson DynaSand filters, then to a Trojan 3000 UV system for disinfection. A V-Notch Weir Box with an ultrasonic sensor is used for flow measurement and the effluent is then discharged to Whartons Branch via Outfall 001.

Waste Activated Sludge (WAS) is sent to two (2) aerobic digesters (250,000 gal cap/each), then to a lined sludge storage lagoon (2MG capacity). Synagro pumps out the sludge twice per year for land application. Return Activated Sludge (RAS) is returned to the aeration basin.

There is no backup power at this facility; if there is no power, there is no flow in the WWTP.

Storm Water Management

The Pinnacle Foods Group facility has eight (8) storm water outfalls on site. Outfalls 002 and 003 discharges consist of storm water run-off from the area surrounding the railroad tracks and run-off from the brine storage area. Outfall 004 discharge consists of storm water run-off from the loading/unloading area, dumpster pad area, and the area surrounding the vinegar plant. Outfall 005 discharge consists of storm water run-off from a portion of the plant roof, all of process room roof, and the pad surrounding the process room. Outfall 006 discharge consists of storm water run-off from half of the middle warehouse roof. Outfall 007 discharge consists of storm water run-off from half of the new warehouse roof and the truck loading area.

Outfall 008 discharge consists of storm water run-off from half of the middle warehouse roof. Outfall 009 discharge consists of storm water run-off from the loading dock and the processing plant roof.

Violations/Observations/Recommendations

- An inspection of the treated wastewater at the sample point showed that the effluent was clear with a slight green tint, with no odor, no sheen, no foam, and no floating solids.
- A review of the February 2012 DMR and analytical data showed that all entries were as reported by analytical (both in-house and contract labs), all calculations were correct, and all entries were accurate. All testing methods, holding times, preservations, and container types were verified as conforming to 40 CFR Part 136.
- The inspector requested a sample taken of the WWTP effluent (Outfall 001) at the designated sample point. A pH analysis was run on the sample. The analysis was reported as 7.36, well within the permit limitation of 6.0 – 9.0 standard units. The pH procedures were reviewed with the operator and all buffers used were found to have acceptable expiration dates: 4.0 – 05/13; 7.0 – 04/13.
- The inspector found the housekeeping to be acceptable.
- Sludge records and hauling permits were reviewed and found to be in compliance.
  -Synagro hauling permit DE OH-254 valid 01/11/10-01/10/15
- The Operations & Maintenance manuals were last reviewed/updated in February 2012.
- SPCC plan was last updated June 15, 2012; all inspections and training are up to date.
- SWPPP was last updated November 2011; all inspections and training are up to date.
- The ultrasonic sensor used for flow measurement was last calibrated 02/23/12.
- A thorough inspection of all storm water outfalls produced the following results:
  -Outfalls 002, 003, 005, 006, 007, 008 & 009 were all clean and dry with no flow.
  -Outfall 004 has a catch basin area which had approximately 2-3" of water, but there was no flow discharging at the time of the inspection.

A short closing meeting was held with Mr. Lynch and Mr. Spence, and all findings were reviewed. Both parties were informed that they would be receiving copies of the inspection follow-up letter and the full inspection report at a later date.

The inspector departed the facility at approximately 1250 hrs.

Nicole L. Smith

Nicole L. Smith
Senior Environmental Compliance Specialist
Delaware – DNREC
Division of Water
Surface Water Discharges Section
Compliance & Enforcement Branch

Static Screens (Headworks)

Screenings into dumpsters for landfill disposal

Grit Channel
(Arrow showing wastewater leaving grit channel to lift station for EQ tank)

Flow EQ Tank

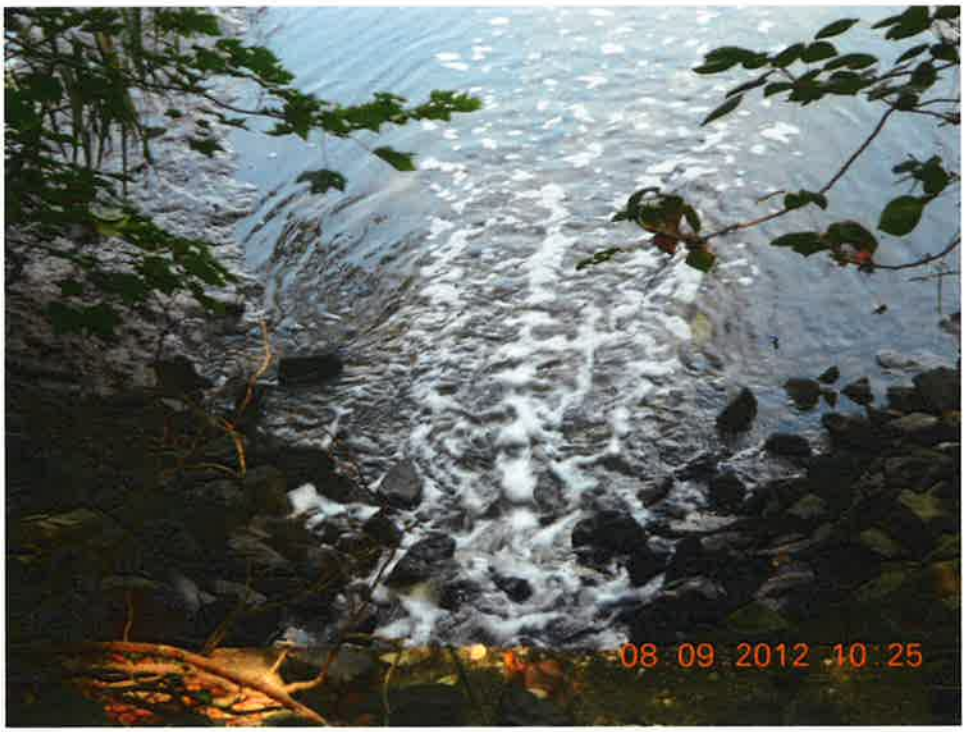
Aeration Basin

Secondary Clarifier

DynaSand Filters

Trojan 3000 UV Disinfection

Outfall 001 designated sample point (ultrasonic flow meter also shown)



Outfall 001 discharge point to Whartons Branch

Aerobic Digester (1 of 2)

Sludge Holding Lagoon

Outfall 002

Outfall 003

Outfall 004

Outfall 005

Outfall 006

Outfall 007

Outfall 008

Outfall 009